

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,  
INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Civil Action No. 1:14-cv-14176-DJC

Defendant,

and

SARAH COLE, FADHAL MOORE,  
ARJINI KUMARI NAWAL, ITZEL  
LIBERTAD VASQUEZ-RODRIGUEZ,  
KEYANNA WIGGLESWORTH, M.B.,  
K.C., Y.D., G.E., A.G., I.G., R.H.,  
J.L., AND R.S.,

Proposed Defendant-  
Intervenors.

**AFFIDAVIT OF LAWRENCE E. CULLEEN**

I, LAWRENCE E. CULLEEN, depose and state as follows:

1. I am an attorney licensed to practice law in the District of Columbia.
2. I am a resident of the District of Columbia.
3. I am a partner at Arnold & Porter, LLP located at 555 Twelfth Street, NW,

Washington, D.C. 20004. The office telephone number is (202) 942-5477.

4. I am authorized to practice law in the following federal court districts: United States District Court for the District of Columbia.

5. I was admitted to practice law in the District of Columbia on December 13, 1982. My D.C. Bar number is 366854.

6. I am a member in good standing and duly licensed and admitted to practice in each of the jurisdictions listed above.

7. I have never been suspended or disbarred in my jurisdiction, and there are no disciplinary actions pending against me in any federal or state court.

8. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

9. If the Court allows the Motion for me to appear *pro hac vice* in this matter, I will represent Proposed Defendant Intervenors in this proceeding until the final determination thereof, and with reference to all matters, incidents, or proceedings, I agree that I shall be subject to the orders and to the disciplinary action and the civil jurisdiction of this Court in all respects as if I were regularly admitted.

Signed under the penalties of perjury on this 20<sup>th</sup> day of May, 2015.

/s/ Lawrence E. Culleen

Lawrence E. Culleen, Esq.